

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DISTRICT**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:16-CV-00489-CWR-JCG**

**HINDS COUNTY, ET AL.**

**DEFENDANTS**

**AFFIDAVIT OF MARY RUSHING**

STATE OF MISSISSIPPI

COUNTY OF HINDS: : :

**COMES NOW** the within named Mary Rushing, an adult resident citizen of Madison County, Mississippi, who makes this Affidavit in the above-styled matter and states on her oath as follows:

1. My name is Mary Rushing. I am an adult resident citizen of the State of Mississippi, over the age of 21 and not otherwise disqualified to testify.
2. I currently serve as the Major over Detention Services for the Hinds County Sheriff's Office. I have held the position of Major for three years and five months. I have been a certified law enforcement officer for 37 years.
3. Hinds County Detention Services has three different facilities: Jackson Detention Center ("JDC"), Raymond Detention Center ("RDC") and the Work Center ("WC").
4. The Jackson Detention Center houses approximately 120 inmates, and it is where the female inmates are housed, as well as male inmates. The male inmates at the

**EXHIBIT "D"**

JDC are considered less violent. However, because the JDC has a more secure facility, some of the problem inmates from the Raymond Detention Center are moved to JDC.

5. The Raymond Detention Center is considered “general population,” and our more violent inmates are housed at this facility.

6. The Work Center is where the inmates with less behavioral problems are housed, as well as sentenced misdemeanants.

7. Since the County has been under a Consent Decree pertaining to Detention Services, we have been working to decrease and control the population.

8. The 433 staffing level recommended by DOJ was based on an average daily inmate population of 1,100. Today our average daily inmate population is 575.

9. Despite recruitment efforts and offering a starting salary above the State of Mississippi it is difficult to hire and retain qualified job candidates. Detention Officers fear they will be terminated for using reasonable, appropriate force when necessary due to DOJ Use-of- Force Guidelines.

10. I am aware of Hinds County’s efforts to draft policies and procedures since 2016. I drafted policies and procedures myself.

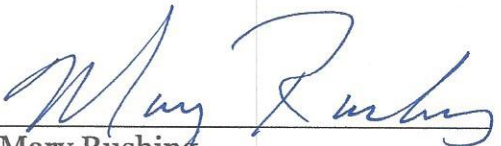
11. In October 2018, Hinds County retained Karen Albert to draft policies and procedures. Ms. Albert has submitted 11 specific policies and procedures to DOJ and has only received a response to two.

12. In regards to Use of Force, the Sheriff added an annual eight hour use-of-force refresher training. The Sheriff also implemented a policy that ALL incident reports including use of force, are completed using jail management system (JMS).

13. In terms of the physical plant, the biggest safety issues are: (1). Doors that cannot be locked (2). Inmates busting lights and/or removing light fixtures from the ceilings.

**FURTHER, AFFLIANT SAYETH NOT.**

**WHEREFORE WITNESS THE EXECUTION HEREOF** on this the 22 day of July, 2019.

  
Mary Rushing

**SWORN TO AND SUBSCRIBED BEFORE ME** this the 22<sup>nd</sup> day of July 2019.

  
NOTARY PUBLIC

My Commission Expires May 18, 2020

